

Joseph R. Saveri (State Bar No. 130064)  
Joshua P. Davis (State Bar No. 193254)  
Matthew S. Weiler (State Bar No. 236052)  
JOSEPH SAVERI LAW FIRM, INC.  
505 Montgomery Street, Suite 625  
San Francisco, California 94111  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
jsaveri@saverilawfirm.com  
jdavis@saverilawfirm.com  
mweiler@saverilawfirm.com

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

**Cung Le, Nathan Quarry, Jon Fitch, on behalf of  
themselves and all others similarly situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**Luis Javier Vazquez and Dennis Lloyd Hallman,  
on behalf of themselves and all others similarly  
situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**Brandon Vera and Pablo Garza, on behalf of  
themselves and all others similarly situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

Case No. 5:14-cv-05484-EJD  
5:14-cv-05591- EJD  
5:14-cv-05621- EJD

**DECLARATION OF JOSEPH R. SAVERI IN  
SUPPORT OF PLAINTIFFS' OPPOSITION  
TO UFC's ADMINISTRATIVE MOTION TO  
ADVANCE HEARING DATE**

Case No. 5:14-cv-05484-EJD  
Case No. 5:14-cv-05591-EJD  
Case No. 5:14-cv-05621-EJD

1 I, Joseph R. Saveri, declare:

2 1. I am the Founding Partner of the Joseph Saveri Law Firm, Inc. ("JSLF"). I am an attorney  
3 of record in these related matters for Plaintiffs Le, Quarry, Fitch, Vazquez, Hallman, Vera and Garza and  
4 a member in good standing with the State Bar of California. I submit this Declaration in support of  
5 Plaintiffs' Opposition to the UFC's<sup>1</sup> Administrative Motion to Advance Hearing Date. Unless otherwise  
6 stated, I have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could  
7 and would testify competently to them.  
8

9 2. I conferred by telephone and email with counsel for UFC prior to entry of the stipulation  
10 on January 16 extending UFC's time to respond to the Complaints filed by Plaintiffs. *See* Docket No. 26.  
11 This stipulation represents the result of extensive negotiation between, and ultimately, the agreement of  
12 Plaintiffs and UFC. In particular, the negotiations resulted in an agreement whereby Plaintiffs agreed to  
13 give UFC more time to prepare motions or other responses to the Complaints and provided both parties  
14 additional time to fully brief the issues raised by such motions and responses. The draft stipulation was  
15 drafted and re-drafted, reflecting the negotiation. The final [Proposed] Stipulation and Order Extending  
16 Response Deadlines, entered as an Order in the Court's docket on January 16, 2015 (Dct. 26) (the  
17 "Stipulation"), represents the fully negotiated agreement of the parties.

18 3. On January 26, 2015 counsel for UFC represented to me that UFC had drafted a motion to  
19 transfer, and asked Plaintiffs to agree to have the transfer motion heard on March 26, 2015. Prior to  
20 January 26, counsel for UFC had expressed no intention to have a transfer motion heard before May 7,  
21 the date set for the Case Management Conference. Plaintiffs were not informed prior to January 26 that  
22 the UFC intended to file a motion to transfer prior to filing other motions responsive to the Complaints.

23 4. On January 27, I informed counsel for UFC that the Stipulation provided the schedule for  
24 UFC's transfer motion, as well as any other motion that UFC would bring in response to the Complaints.

25 5. Attached at **Exhibit 1** is a true and correct copy of a subpoena served by JSLF on Twitter,  
26 Inc. ("Twitter") on or about January 8, 2015  
27

28 <sup>1</sup> Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC ("UFC").

6. Attached at **Exhibit 2** is a true and correct copy of a subpoena served by JSLF on Google, Inc. (“Google”) on or about January 7, 2015.

7. JSLF served subpoenas on Twitter and Google because it was informed that UFC President Dana White deleted “tweets” from his account immediately after the *Le* Complaint was filed.

8. In addition to Twitter and Google, and named Plaintiff Mr. Le, JSLF is aware of several other witnesses who reside in the Northern District of California. On information and belief, Scott Coker, the founder of former UFC competitor Strikeforce, and current president of Bellator, operated Strikeforce from San Jose; Malcolm Bordelon, the Executive Vice President of Business Operations at Sharks Sports & Entertainment, fka Silicon Valley Sports & Entertainment (which had an ownership interest in Strikeforce), resides in or around San Jose; Finally, Electronic Artists (“EA”) Sports, which created a UFC video game, has offices in this District. Additionally, several class members reside in this District.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in San Francisco, California on February 2, 2015.

/s/ Joseph R. Saveri  
Joseph R. Saveri